

October 17, 2005

Eileen Wenger Tutt
Special Advisor to the Secretary California Environmental Protection Agency
California Environmental Protection Agency
1001 I Street, P.O. Box 2815
Sacramento, Ca. 95814

Re: Air Districts' Potential Role in Climate Action Plan

Dear Ms. Tutt:

As Air Pollution Control Officer for the Sacramento Metropolitan Air Quality Management District, I would like to make a preliminary comment on the issue of what role air districts might play in the Climate Action Plan that Cal-EPA is presently preparing.

Air Districts are being considered for a role in monitoring GHG emission reductions and inventory refinement because of the historical significance and specific expertise of air districts in inventory development, verification, and quality control. Districts are uniquely qualified to quantify air emissions. Districts monitor criteria and toxic air pollutants. State law establishes the authority of districts to issue permits, adopt rules, and to enforce compliance with permits and rules, and to implement incentive programs. Districts also manage mitigation or offset banks and approve offsets. Districts also develop plans for local compliance with state and federal air quality standards, with opportunities for public participation, and these are required to be adopted by locally elected officials serving on air district boards. Finally, AQMDs have a traditional role and a network of relationships enabling them to educate business and recruit businesses into participation in voluntary programs. Some air districts have also joined the California Climate Action Registry to support greenhouse gas reduction efforts by that nonprofit organization.

Our own district manages an aggressive regional public education program that is another possible venue for district involvement in climate action.

Michael Benjamin of Cal-EPA met with the California Air Pollution Control Officers Association [CAPCOA] Emission Inventory Technical Advisory Committee (EITAC) on July 21st and discussed with them recent developments related to climate change, including the Governor's Executive Order. CAPCOA has formed a task force to begin assessment of what role air districts could play.

Eileen Wenger Tutt

October 17, 2005

Page 2

At present AQMDs/APCDs lack legislative authorization to be part of the State's Climate Action Plan. Air districts must be actively engaged in the policy discussion to shape any role they may plan. If districts are to play a role, they must be authorized by the legislature to engage in greenhouse gas emission reduction activities. I urge you to work closely with CAPCOA and air districts to define and assess potential roles.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene". The signature is fluid and cursive, with the first name "Larry" and last name "Greene" clearly distinguishable.

Larry Greene

Air Pollution Control Officer

cc: Alan C. Lloyd, Ph.D., Agency Secretary, California Environmental Protection Agency
Ann Baker, California Environmental Protection Agency